

1 Program. After the order for EAJA fees is entered, the government will determine whether they
2 are subject to any offset.

3 Fees shall be made payable to Plaintiff, but if the Department of the Treasury determines
4 that Plaintiff does not owe a federal debt, then the government shall cause the payment of fees,
5 expenses, and costs to be made directly to Olinsky Law Group, pursuant to the assignment
6 executed by Plaintiff. Payments may be made by electronic fund transfer (EFT) or by check,
7 and shall be delivered to Olinsky Law Group.

8 This stipulation constitutes a compromise settlement of Plaintiff's request for EAJA
9 attorney fees, not an admission of liability on the part of Defendant, under the EAJA or
10 otherwise. Payment of the agreed amount shall constitute a complete release from, and bar to,
11 any and all claims that Plaintiff and/or counsel, including counsel's firm, may have relating to
12 EAJA attorney fees in connection with this action.

13 This award is without prejudice to the rights of counsel and/or counsel's firm to seek
14 Social Security Act attorney fees under 42 U.S.C. § 406(b), subject to the savings clause
15 provisions of the EAJA.

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17 Respectfully submitted,

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19 Date: June 23, 2025

/s/ Stuart T. Barasch, Esq.
STUART T. BARASCH
Attorney for Plaintiff

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22 STEPHANIE M. HINDS
United States Attorney

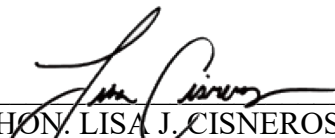
23 /s/ Ryan T. Lu, Esq.¹
24 Ryan T. Lu, ESQ.
25 Special Assistant United States Attorney
26 Attorneys for Defendant
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28 ¹ Counsel attests that Ryan Lu, on behalf of Defendant, concurs in the content of this filing and
authorized this filing via email on June 23, 2025.

~~PROPOSED~~ ORDER

Pursuant to the foregoing stipulation, THE COURT ORDERS Defendant to award Plaintiff attorney fees in the amount of \$7,004.96 (SEVEN THOUSAND FOUR DOLLARS AND NINETY-SIX CENTS) under the Equal Access to Justice Act (EAJA), 28 U.S.C. § 2412(d), and costs in the amount of \$405.00 (FOUR HUNDRED FIVE DOLLARS AND ZERO CENTS) under 28 U.S.C. § 1920.

Date: June 25, 2025


HON. LISA J. CISNEROS
United States District Judge